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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF EDWARD J. RADETICH, JR.  
IN SUPPORT OF REORGANIZED DEBTORS'  
NINTH SECURITIES CLAIMS OMNIBUS  
OBJECTION (NO LOSS CAUSATION –  
SECURITIES SOLD PRIOR TO THE FIRST  
PURPORTED “CORRECTIVE DISCLOSURE”)**

**Response Deadline:**

**August 11, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: August 25, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Edward J. Radetich, Jr., pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Managing Director of Kroll Settlement Administration LLC (“KSA”), an affiliate  
5 of Prime Clerk LLC (“Prime Clerk”). KSA’s main office is located in Philadelphia, Pennsylvania.

6 2. I am providing this Declaration in support of the *Reorganized Debtors’ Ninth Securities*  
7 *Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported*  
8 *“Corrective Disclosure”)* (the “**Omnibus Objection**”),<sup>1</sup> filed contemporaneously herewith in the above-  
9 captioned chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric  
10 Company, as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized**  
11 **Debtors**,” as applicable).

12 3. I have extensive experience and expertise in all aspects of claims administration,  
13 including direct notice, paper and electronic publication, nominee outreach, website design, claimant  
14 communication, claims intake and processing, distribution of payments, and tax reporting. Notably, I  
15 personally oversaw the very first securities class action, the Atlantic Department Stores class action  
16 lawsuit in 1975. Since then, our team has administered more than 3,000 matters involving securities  
17 fraud, antitrust, consumer, employment and labor, and government enforcement actions. Our team has  
18 handled all aspects of claims administration in many noteworthy securities class action settlements in  
19 recent years, including *In re Bank of America Corporation Securities Litigation*, No. 11-CV-00733-  
20 WHP (S.D.N.Y); *In re Longwei Petroleum Investment Holding Limited Securities Litigation*, No. 13  
21 Civ. 214 (RMB) (S.D.N.Y); and *In re The Bank of New York Mellon ADR FX Litigation*, No. 1:16-cv-  
22 00212 (S.D.N.Y). A detailed description of my experience and qualifications is attached hereto as  
23 **Exhibit A**.

24 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
25 my personal knowledge, the knowledge of other employees working under and alongside me on this  
26 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various

27  
28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Omnibus Objection.

1 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I  
2 would testify competently to the facts set forth in this Declaration. I am authorized to submit this  
3 Declaration on behalf of the Reorganized Debtors.

4 **Identification of Claims Subject to the Omnibus Objection**

5 5. KSA has been asked by the Reorganized Debtors and their counsel to assist with  
6 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the  
7 Chapter 11 Cases, including identifying claims to be included in the Omnibus Objection. In furtherance  
8 thereof, our team has established and reviewed a database for these claims. The database contains  
9 information extracted from proofs of claim or submitted by claimants via an online portal and/or other  
10 means, including, where such details were provided by the claimant, information regarding when such  
11 claimant purports to have acquired their position(s) in the Debtors' debt and equity securities that form  
12 the basis of the claim.

13 6. Based on our review, we have identified certain claims where the Securities Claimant  
14 disposed of its entire position(s) in the Debtors' securities before October 12, 2017. The identified claims  
15 are set forth on Exhibit 1 to the Omnibus Objection, which was prepared by our team under my general  
16 supervision, and I am familiar with the documents, their contents, and the process under which Exhibit  
17 1 was prepared.

18 7. Specifically, we identified claims where the Securities Claimant had purchased or  
19 otherwise acquired, and then sold or disposed of, their entire positions in the Debtors' securities before  
20 October 12, 2017, and did not purchase the Debtors' securities thereafter.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief.

3  
4 Executed July 14, 2021 in New Jersey.

5  
6 /s/ Edward J. Radetich, Jr.

7 Edward J. Radetich, Jr.

8 Managing Director  
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